# **OPEN MEETING ITEM**





22

Arizona Corporation Commission

DOCKETED

JUN 2 7 2005

DUCKETED BY

**ARIZONA CORPORATION COMMISSION** 

DATE:

MARC SPITZER

MIKE GLEASON KRISTIN K. MAYES

June 27, 2005

DOCKET NO:

E-04100A-04-0527 and E-01773A-04-0528

TO ALL PARTIES:

Enclosed please find the recommendation of Administrative Law Judge Jane Rodda. The recommendation has been filed in the form of an Opinion and Order on:

> SOUTHWEST TRANSMISSION COOPERATIVE, INC. and ARIZONA ELECTRIC POWER COOPERATIVE, INC.

## (RATES)

Pursuant to A.A.C. R14-3-110(B), you may file exceptions to the recommendation of the Administrative Law Judge by filing an original and thirteen (13) copies of the exceptions with the Commission's Docket Control at the address listed below by 4:00 p.m. on or before:

## JULY 6, 2005

The enclosed is NOT an order of the Commission, but a recommendation of the Administrative Law Judge to the Commissioners. Consideration of this matter has tentatively been scheduled for the Commission's Open Meeting to be held on:

## JULY 12 and 13, 2005

For more information, you may contact Docket Control at (602)542-3477 or the Hearing Division at (602)542-4250. For more information about the Open Meeting, contact the Executive Secretary's Office at (602) 542-3931.

BRIAN C. McNEIL

**EXECUTIVE SECRETARY** 

#### 1 BEFORE THE ARIZONA CORPORATION COMMISSION 2 **COMMISSIONERS** 3 JEFF HATCH-MILLER, Chairman WILLIAM A. MUNDELL 4 MARC SPITZER MIKE GLEASON 5 KRISTIN K. MAYES 6 IN THE MATTER OF THE APPLICATION OF DOCKET NO. E-04100A-04-0527 SOUTHWEST TRANSMISSION COOPERATIVE, 7 INC, FOR A RATE INCREASE. 8 IN THE MATTER OF THE APPLICATION OF E-01773A-04-0528 ARIZONA ELECTRIC POWER COOPERATIVE, 9 INC. FOR A RATE INCREASE. DECISION NO. 10 **OPINION AND ORDER** 11 DATE OF HEARING: April 14, 2005 12 PLACE OF HEARING: Tucson, Arizona 13 Jane L. Rodda ADMINISTRATIVE LAW JUDGE: 14 **APPEARANCES:** Michael M. Grant, Gallagher & Kennedy, PA, on behalf of Southwest Transmission 15 Cooperative, Inc.; 16 Michael A. Curtis, Curtis, Goodwin, Sullivan, Udall & Schwab, PLC, on 17 behalf of Mohave Electric Cooperative, Inc.; 18 Christopher Hitchcock, Law Offices of 19 Christopher Hitchcock, for Sulphur Springs Valley Electric Cooperative; 20 John Leonetti, in propera persona; and 21 Timothy Sabo and Diane Targovnik, 22 Commission Legal Division for the Utilities Division. 23 BY THE COMMISSION: 24 25 Having considered the entire record herein and being fully advised in the premises, the 26 Arizona Corporation Commission ("Commission") finds, concludes, and orders that: 27 **FINDINGS OF FACT**

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On the same date, its affiliate, Arizona Electric Power Cooperative, Inc. ("AEPCO") filed a rate application (Docket No. E-01773A-04-0528).

- On July 23, 2004, Southwest Transmission Cooperative, Inc. ("SWTC" or 1. "Cooperative") filed an Application for General Rate Increase.
- SWTC is a non-profit, transmission cooperative that commenced operations on August 2. 1, 2001, following Commission approval of AEPCO's restructuring in Decision No. 63868. SWTC primarily provides wholesale transmission services to AEPCO on behalf of its five all-requirements Class A member distribution cooperatives and to Mohave Electric Cooperative, Inc., a partial requirements member. The six Class A members of AEPCO are also Class A members of SWTC. The Class A members are Anza Electric Cooperative, Inc. ("Anza"), located entirely in California; Duncan Valley Electric Cooperative, Inc. ("DVEC"), located partially in New Mexico; Graham County Electric Cooperative, Inc. ("GCEC"); Sulphur Springs Valley Electric Cooperative, Inc. ("Sulphur Springs"); Trico Electric Cooperative, Inc. ("Trico"); and Mohave Electric Cooperative, Inc. ("Mohave").
- 3. SWTC is a borrower from the Rural Utilities Service ("RUS"), a division of the United States Department of Agriculture. As an RUS borrower, SWTC is subject to regulation by virtue of its mortgage and pursuant to federal regulations. As a transmitting utility under Section 211 of the Federal Power Act, SWTC is subject to certain jurisdiction of the Federal Energy Regulatory Commission ("FERC").
- 4. On August 27, 2004, Commission Utilities Division Staff ("Staff") notified SWTC that its Application met the sufficiency requirements of A.A.C. R14-2-103. Staff classified SWTC a Class A utility.
- 5. Counsel for SWTC and Staff requested a Procedural Conference prior to the Hearing Division issuing its Procedural Order setting the matter for hearing. Pursuant to Procedural Order dated September 3, 2004, a Procedural Conference was held on September 9, 2004. SWTC requested an expedited schedule for filing testimony and conducting the hearing based on the Commission's prior indication that it would be flexible when considering rate applications from cooperatives, and upon the allegation that SWTC and AEPCO were losing money and would be in technical default of

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financial ratios set by its lenders. Staff opposed the expedited schedule because the issues in this case are potentially complex and Staff wanted to be sure that all issues received adequate analysis. Staff claimed it needed the full 180 days allowed under Commission Rules for Staff to file testimony in a Class A utility rate case. In addition, Staff requested that the AEPCO and SWTC rate applications be consolidated on the grounds that they are affiliates and there will be issues and witnesses in common which favor consolidation. Staff feared that if the records were not consolidated, one or the other might be incomplete. SWTC and AEPCO opposed consolidation, believing that it might lead to confusion.

- 6. By Procedural Order dated September 15, 2004, the Commission denied the request for an expedited schedule. The applications are the first rate cases for AEPCO and SWTC since the restructuring, and the Commission found that the need for a thorough analysis outweighed the request for expedited treatment. In addition, because the applications involve affiliates and their rate cases will involve several inter-related issues, the Commission consolidated the matters for hearing.
- 7. The September 15, 2004, Procedural Order established deadlines for filing testimony and set the consolidated hearing to commence April 14, 2005, at the Commission's offices in Tucson, Arizona.
- 8. On January 11, 2005, SWTC and AEPCO filed a Notice of Filing that indicated they had mailed notice of the hearing to their members and customers and had caused the notice of the hearing to be published in newspapers and in the newsletters of their member distribution cooperatives, as required by September 15, 2004, Procedural Order.
- 9. Intervention was granted to Mohave on November 2, 2004; to Sulphur Springs on January 25, 2005; and to John T. Leonetti, a resident in Trico Electric Cooperative, Inc.'s service territory, on March 10, 2005.
- 10. With its Application, SWTC filed the direct testimony of Dirk Minson, AEPCO's Chief Financial Officer; Gary Pierson, Manager of Financial Services for Sierra Southwest Cooperative Services, Inc. ("Sierra Southwest") and who provides treasury, cash management, risk management and rate design/implementation functions for SWTC; and William Edwards, an economist and Vice President of Regulatory Affairs for the National Rural Utilities Cooperative

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Finance Corporation ("CFC"). Pursuant to the September 15, 2004 Procedural Order, Staff filed the direct testimony of Crystal Brown, Alejandro Ramirez, Erin Casper and Jerry Smith on February 23, 2005. On March 16, 2005, AEPCO filed the rebuttal testimony of Messrs. Minson and Pierson. On April 4, 2005, Staff filed the surrebuttal testimony of Ms. Brown, Ms. Casper and Mr. Ramirez.

- 11. The hearing convened as scheduled on April 14, 2005, before a duly authorized Administrative Law Judge.
  - 12. SWTC, Staff, Mohave and Mr. Leonetti filed Closing Briefs.
- 13. In the course of this consolidated proceeding the Commission received at least 23 letters and phone calls from customers of the distribution cooperatives in opposition to the proposed increase.
- 14. According to SWTC, two main reasons are driving SWTC's request for rate relief. The first is necessary maintenance and upgrades of the transmission system—chief among these being the Winchester Interconnect Project that was placed into service in May 2004. Winchester was completed to enhance system reliability and provide for improved performance of the entire transmission system. It had a significant impact on SWTC's debt and total transmission plant, as its cost of \$15.7 million is about 20 percent of the Cooperative's total depreciated transmission plant. The major reason behind the application is Morenci Water & Electric Company's ("MW&E") bypass of the SWTC transmission system. In the fall of 2004, MW&E, a wholly-owned subsidiary of the Phelps Dodge Corporation, completed facilities allowing it to directly interconnect to the Tucson Electric Power Company transmission system. MW&E stopped taking non-firm transmission service from SWTC on November 1, 2004, and has cancelled its firm transmission service agreement effective December 31, 2005. Those events represent a more than \$5 million loss in transmission revenues—approximately 20 percent of SWTC's adjusted Test Year operating revenues.
- 15. In the test year ended December 31, 2003 ("Test Year"), SWTC had Adjusted Revenue of \$25,148,196, which produced an Adjusted Operating Margin of \$2,480,064 a 3.2 percent rate of return on an adjusted Original Cost Rate Base ("OCRB") of \$76,345,655.
- 16. Because the effect of the post- Test Year loss of the MW&E firm power contract is known and measurable, SWTC proposed that the Commission authorize a procedure to allow SWTC

to adjust its rates in January 2006, to account for the loss of that revenue without having to file another rate case. Additional revenues of \$2,294,640 would be required to make up for the loss of the MW&E contract. Adjusting Test Year revenues for the known and measurable loss of the MW&E contract, reduces total revenues to \$22,853,736 and Operating Income to \$185,604.

- 17. The Cooperative sought a total revenue requirement of \$29,500,476, an increase of \$6,646,740 to produce an Operating Margin of \$6,932,344, an 8.95 percent rate of return on adjusted OCRB, a Times Interest Earned Ratio ("TIER") of 1.17 and Debt Service Coverage ("DSC") of 1.02.
- 18. SWTC proposed, and Staff agreed to, a four step phase in of the increase over two years. The first phase would become effective immediately and implement an increase of \$3,666,668, or 14.58 percent; the second phase would become effective on January 1, 2006 and implement an additional increase of \$2,294,460, or 9.1 percent to account for the loss of the MW&E contract; Phase Three would become effective on August 1, 2006 and implement an increase of \$342,806, or 1.5 percent; and Phase Four would be effective on August 1, 2007 and implement an additional increase of \$342,806, or 1.5 percent. SWTC proposed Phases Three and Four to address Staff's concerns expressed in its rebuttal testimony, that the proposed Second Phase increase on January 1, 2006 would not be adequate to allow SWTC to service its current outstanding debt, finance future capital projects and improve its equity position.
  - 19. Staff and SWTC agreed on the revenue requirement, rate design and rate base.
- 20. The first phase of the increase would produce annual operating revenue of \$28,814,864 would go into effect upon the Commission approval of this Order, and would produce an operating TIER of 1.16, DSC of 1.02, and an 8.05 percent return on OCRB.
- 21. The second phase would become effective as of January 1, 2006, would increase rates an additional \$2,294,460 to account for the loss of the MW&E contract, thereby maintaining the same total annual revenues of \$28,814,864, TIER of 1.16, DSC of 1.02, and 8.05 percent rate of return on OCRB.
- 22. The third phase, effective August 1, 2006, would increase revenues an additional \$342,806, or 1.5 percent, resulting in total annual revenues of \$29,157,670, a TIER of 1.22, DSC of 1.04 and a rate of return of 8.5 percent on OCRB.

- 23. The fourth phase, effective August 1, 2007, would increase revenues an additional \$342,806, resulting in total annual revenues of \$29,500,476, a TIER of 1.29, DSC of 1.07 and an 8.95 percent rate of return on OCRB.
- 24. SWTC estimates that Phase One of the proposed increase would increase the average residential consumer's monthly bill by about \$1.45. Phase Two would increase the average residential consumer's monthly bill an additional \$0.90, and the combined effect of the 1.5 percent increases in 2006 and 2007 would increase the average monthly bill by 22 cents over the next two years.
  - 25. A schedule of the proposed rates and charges is attached hereto as Exhibit A.
- 26. Mohave recommends that the Commission approve the first phase of the proposed SWTC increase to become effective immediately, but that it conditionally authorize the prospective phase 2, 3 and 4 increases only if SWTC submits relevant financial information to the Commission and SWTC's members demonstrating that the increases are necessary to permit SWTC to meet its financial obligations.
- 27. Mr. Leonetti believes that neither AEPCO nor SWTC demonstrated that the proposed rates are fair and reasonable with respect to the effect on end user consumers.
- 28. We concur with Staff and SWTC that a total revenue requirement of \$29,500,476, phased in over two years, in four phases as proposed, is fair and reasonable. The evidence supports a finding that the approved revenues are necessary for SWTC to meet its financial obligations and improve its equity position.
- 29. Staff and SWTC agree that an adjusted original cost rate base of \$76,345,655 is fair and reasonable. No party disputed Staff's adjustments to rate base and Staff's adjustment appear reasonable. SWTC waived a reconstruction cost new rate base and thus, its original cost rate base is the equivalent of its fair value rate base.
- 30. Staff and SWTC were in agreement on all issues of revenue requirement, rate base, and rate matters. The two issues Staff and SWTC disagree on are Staff's recommendation that the Commission establish an equity target for SWTC of 30 percent of total capitalization and that in future rate cases SWTC prepare a cost of service study for Anza.

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- 31. SWTC's equity was 4.7 percent of its total capitalization at the end of the Test Year. SWTC's equity subsequently dropped to about 3 percent. (TR at 139-40)
- Staff recommends that SWTC file a capital improvement plan by March 31, 2006. 32. Staff further recommends that the Commission set an equity goal for SWTC of 30 percent. Staff based its recommended goal on (1) the goals set in prior orders concerning AEPCO (Decision No. 64227); (2) SWTC's need to achieve greater financial flexibility; and (3) an article by Fitch Ratings which states that an equity-to-capitalization ratio between 25 to 30 percent is adequate for a generation and transmission cooperative. (Ex S-12 at 6) Staff notes that in Decision No. 67748 (April 11, 2005), the Commission recently approved the same 30 percent equity goal for Graham County Utilities.<sup>2</sup> Staff believes the 30 percent equity goal would be consistent with RUS regulations which limit patronage refunds until 30 percent equity is achieved.
- 33. Staff further recommends that the Commission limit SWTC from making patronage refunds. Specifically, Staff recommends that SWTC should not be permitted to make any patronage refunds while its equity level remains below 20 percent of total capitalization. If SWTC's equity level is between 20 percent and 30 percent, Staff recommends that patronage refunds be limited to 25 percent of net earnings, which Staff states parallels the RUS regulations.
- 34. Staff also recommends that to ensure SWTC makes progress in building equity, that it should be required to file a rate case no later than 3 to 5 years from the date of this Decision.
- 35. In Decision No. 64227 (November 29, 2001) the Commission approved a financing request and required SWTC to file a capital plan by December 31, 2003. In that docket, Staff recommended that SWTC increase its equity to 10 percent by December 31, 2006, to 15 percent by December 31, 2010, and to 30 percent by December 31, 2015.
- 36. SWTC filed its Capital Plan as required under Decision No. 64227, on December 23, 2002, and provided a copy as a late-filed exhibit in this docket. The 2002 plan indicated that based on the assumptions in palce at the time, projected equity levels would reach 13 percent in 2006, 26 percent in 2010 and approach 30 percent in 2011. The plan did not factor in the large revenue loss

<sup>&</sup>lt;sup>2</sup> Graham County Utilities, Inc., ("GCU") is a cooperative owned by Graham County Electric Cooperative, Inc. to provide natural gas and water service. Graham County Electric Cooperative is the Class A member of AEPCO.

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from the MW&E bypass.

- SWTC does not oppose filing an equity improvement plan or the requirement that it file a rate case not later than five years. SWTC opposes, however, the concept that 30 percent equity is an appropriate goal for the Commission to adopt. SWTC cites evidence that the average and median equity levels for generation and transmission cooperatives nationwide is much lower. SWTC also argues that there are many factors, besides equity, which impact the financial strength of SWTC. According to SWTC, Fitch Ratings looked at some 12 different factors in assigning a rating to Golden Spread Electric Cooperative (the subject of the article cited by Staff) including the strength of its requirements contracts, management quality, adequate liquidity, overall financial profile, DSC and TIER, as well as equity. SWTC argues that neither it nor the Commission wants to be in the difficult position where unnecessarily high rate increases are driven by an equity target that is inflexible and arbitrarily set.
- 38. Mohave argues that SWTC's equity improvement analysis should include an analysis of the benefits, if any, that partial requirement members and full requirement members, obtain by improving the equity position of SWTC, as well as methods other than rate increases for improving equity and a consideration of possible methods to permit future borrowings to meet load growth of the all requirements members to be based on the equity of those all requirements members.
- 39. The evidence presented in this proceeding indicates that SWTC must improve its equity position. It is currently not in compliance with its lender's equity requirements. The evidence is inconclusive, however, to make a finding at this time that a 30 percent capital requirement is an appropriate goal for a transmission cooperative such as SWTC. Mr. Edwards testified that the median equity ratio for a generation and transmission cooperative is 13.22 percent in 2002, the most recent available year of data. Furthermore, the RUS and CFC do not discriminate on the price of loans based on equity levels. (TR at 63). There is some evidence that adopting and enforcing an equity goal of 30 percent may place undue upward pressure on rates and that a 30 percent equity level is not required to protect AEPCO's ability to access the financial markets. On the other hand, just because national averages for generation and transmission cooperatives are below 20 percent, does not mean that we should not strive for equity greater than that to give the cooperative a cushion to

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weather economic setbacks. AEPCO did not present sufficient evidence to allow us to determine that a specific goal less than 30 percent is reasonable. In his rebuttal testimony, Mr. Minson testified that the revenues that the Cooperative was recommending at that time (somewhat less than their final position) would allow SWTC to approach 15 percent equity in about ten years. (Ex SWTC-2 at 3). We believe that SWTC should update its December 2002 Capital Improvement Plan, with updated assumptions and provide an analysis of the rates that would be required to achieve an equity level of 30 percent, within ten years, or 2015. We do not adopt a requirement now, or do we read Decision No. 64227 as requiring, that SWTC achieve any specific equity goal. We do adopt the rates herein with the expectation that SWTC will be able to build much needed equity. Because we are requiring SWTC to file another rate case in no more than five years, in any case, adopting an ultimate goal of 30 percent at this time is not necessary. We concur with Mohave that the equity improvement plan should also address an analysis of the effect of the equity improvement on partial and well as full requirements members. Our decision not to accept a 30 percent equity goal at this time should not be interpreted as a finding on any particular ultimate equity requirement.

- 40. Neither SWTC nor AEPCO filed jurisdictionally separated information for Anza in this rate case, nor has AEPCO ever filed such information in any prior rate case.
- 41. Staff recommends that in its next rate case, SWTC prepare jurisdictionally separated schedules for Anza.
  - 42. Commission rule R14-2-103(B)(4) provides in relevant part:

Separation of nonjurisdictional properties, revenues and expenses associated with the rendition of utility service not subject to the jurisdiction of the Commission must be identified and properly separated in a recognized manner when appropriate. In addition, all nonutility properties, revenues and expenses shall likewise be segregated.

43. Staff argues that jurisdictional separation is an important tool that Staff uses to ensure that rates are fair and cost-based. Staff states that Duncan Valley Electric Cooperative Inc., Garkane Power Association, Inc. and Columbus Electric Cooperative, all cooperatives within the Commission's jurisdiction with multi-state operations, file jurisdictionally separated information, Staff does not believe arguments that a separation study would be too costly in comparison with the expected benefits to justify a waiver of the requirement. Staff also asserts that once the first study is

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prepared, future separations will be substantially easier.

- 44. SWTC and AEPCO opposed the recommendation to jurisdictionally separate operations associated with Anza. According to the applicants, Anza's load represents only 1.5 percent of AEPCO's total energy sales in 2003. AEPCO estimates the cost of a separation study would be \$40,000 to \$60,000 and the cost of service differences for Anza, if any, would not justify the expense or the effort to evaluate its findings. Under these circumstances, the applicants argue that to prepare such study would be an "undue burden," which is one of the grounds for waiver under A.A.C. R14-2-103.B.6.
- 45. We find that it is premature for the Commission to determine if a waiver of the requirement to file a jurisdictional separation study for Anza should be granted in connection with SWTC's next rate case. We believe that SWTC should have the opportunity to request such waiver prior to or in its next rate filing, but we cannot pre-judge whether the circumstances present today concerning Anza's load will be present in the future.

## **CONCLUSIONS OF LAW**

- 1. SWTC is a public service corporation pursuant to Article XV of the Arizona Constitution and A.R.S. §§ 40-282 and 40-285.
- 2. The Commission has jurisdiction over SWTC and the subject matter of the application.
  - 3. Notice of the proceeding was provided in conformance with law.
- 4. The stipulated rates and charges as set forth in and approved herein, and attached as Exhibit A, are reasonable.
- 5. The recommendations set forth in the Findings of Fact discussed hereinabove are reasonable and should be adopted in accordance with the discussion therein.

## **ORDER**

IT IS THEREFORE ORDERED that the rates and charges set forth in Exhibit A are approved and Southwest Transmission Cooperative, Inc. shall file on or before July 29, 2005, a tariff that complies with the rates and charges approved herein.

IT IS FURTHER ORDERED that the rates and charges for Phase One shall be effective for

### DOCKET NO. E-04100A-04-0527 et al.

all service provided on and after August 1, 2005; the Phase Two rates shall be effective January 1, 2006; Phase Three rates shall be effective August 1, 2006, and Phase Four shall be effective August 1, 2007. IT IS FURTHER ORDERED that within 15 days of the effective date of this Order, Southwest Transmission Cooperative, Inc. shall notify its member/customers of the rates and the effective dates approved herein. IT IS FURTHER ORDERED that Southwest Transmission Cooperative, Inc. shall file a rate case no later than five years after the effective date of this Decision. IT IS FURTHER ORDERED that Southwest Transmission Cooperative, Inc. shall file by March 31, 2006, an equity improvement plan that conforms with the discussion herein. 

1	IT IS FURTHER ORDERED that Southwest Transmission Cooperative, Inc. shall not make					
2	any patronage refunds while its equity level remains below 20 percent of total capitalization, and					
3	patronage refunds shall be limited to 25 percent of net earnings if its equity is between 20 and 30					
4	percent of its capitalization.					
5	IT IS FURTHER ORDERED that this Decision shall become effective immediately.					
6	BY ORDER OF THE ARIZONA CORPORATION COMMISSION.					
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9	CHAIRMAN COMMISSIONER					
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13	COMMISSIONER COMMISSIONER COMMISSIONER					
14	IN WITNESS WHEREOF, I, BRIAN C. McNEIL, Executive					
15	Secretary of the Arizona Corporation Commission, have hereunto set my hand and caused the official seal of the					
16	Commission to be affixed at the Capitol, in the City of Phoenix, this day of, 2005.					
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18	BRIAN C. McNEIL					
19	EXECUTIVE SECRETARY					
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1 SERVICE LIST FOR: SOUTHWEST TRANSMISSION COOPERATIVE, INC. and ARIZONA ELECTRIC **POWER** 2 COOPERATIVE, INC. 3 DOCKET NO .: E-04100A-04-0527 AND E-01773A-04-0527 4 Michael M. Grant 5 Todd C. Wilev Gallagher & Kennedy, P.A. 2575 E. Camelback Road Phoenix Arizona 85016-9225 Michael A. Curtis 8 William P. Sullivan K. Russell Romney MARTINEZ & CURTIS, P.C. 2712 North 7<sup>th</sup> Street 10 Phoenix, Arizona 85006 Attorneys for Mohave Electric Cooperative Inc. 11 Christopher Hitchcock 12 LAW OFFICE OF CHRISTOPHER HITCHCOCK, PLC P.O. Box AT 13 Bisbee, Arizona 85603-0115 Attorney for SSVEC 14 John T. Leonetti 15 HC 70 Box 4003 Sahuarita, Arizona 85629 16 Christopher Kempley, Chief Counsel 17 LEGAL DIVISION Arizona Corporation Commission 18 1200 W. Washington Street Phoenix, Arizona 85007 19 Ernest Johnson, Director 20 **Utilities Division** Arizona Corporation Commission 21 1200 W. Washington Street Phoenix, Arizona 85007 22 23 24 25 26 27

## EXHIBIT A

		Effective Dates			
Notes als Tarananiasias Carais		August 1, 2005	<u>January 1, 2006</u>	August 1, 2006	August 1, 2007
Network Transmission Service: Transmission Rate - \$/month Ancillary Services:		\$1,420,722	1,566,081	1,587,088	1,608,258
AllCilla	Schedule 1: System Control and Load Dispatch \$/kW Mon.	0.289	0.289	0.289	0.289
	Schedule 2: Cost of Reactive Power (VAR) Production - \$/Kw Mon.	0.095	0.107	0.133	0.120
	Schedule 3: Regulation and Frequency Response – \$/kw Mon.	0.453	0.453	0.463	0.472
	Schedule 4: Energy Imbalance - \$/MWh	20.40	20.40	20.40	20.40
	Schedule 5: Operating Reserves – Spinning - \$/kW Mon	0.685	0.685	0.699	0.713
Point to	Schedule 6: Operating Reserves – Supplemental - \$/kW Mon.	0.442	0.442	0.451	0.461
romtu	Firm Point-to-Point Rate -	3.022	3.334	33.79	3.423
	\$/kW Month Non-Firm Point-to-Point Rate - \$/kW Month	3.022	3.334	3.379	3.423
	Point-to-Point Rate (MWE 60 MW Firm) - \$/kW Month	3.004	-	-	-
Ancilli	Point-to-Point Rate (City of Thatcher Firm) - \$kW Mon. ary Services:	2.605	2.878	2.923	2.968
7 *************************************	Schedule 1: System Control and Load Dispatch - \$/kW Mon.	0.289	0.289	.0289	0.289
	Schedule 2: Cost of Reactive Power (CAR) Production – \$/kW Mon.	0.076	0.083	0.089	0.094
	Schedule 3: Regulation and Frequency Response – \$/kW Mon.	0.453	0.453	0.463	0.472
	Schedule 4: Energy Imbalance - \$/kW Mon.	20.40	20.40	20.40	20.40
	Schedule 5: Operating Reserves – Spinning - \$/kW Mon	0.685	0.685	0.699	0.713
	Schedule 6: Operating Reserves – Supplemental - \$/kW Mon.	0.442	0.442	0.451	0.461

EXHIBIT A

DECISION NO.